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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On December 17, 2018, AJ Burton, Diana Eisner, and Kalyan Kidambi (by phone) met with Suzanne Yelen, Rodger Woock, Cha-Chi Fan and Stephen Wang as well as Alec MacDonell and Cathy Zima (both by phone) of the FCC. Representatives from Frontier discussed the framework for measuring the speed and latency performance for recipients of high-cost universal service support – specifically, the random selection methodology for speed testing.¹

Frontier explained that its engineers have developed a speed testing solution that allows a customer to plug in a Raspberry Pi microcomputer into the customer remote gateway to take all necessary measurements. While Frontier has seriously explored and continues to explore the possibility of loading software directly onto existing and new remote gateways, Frontier is unsure whether it will be able to design and implement such a comprehensive software solution that meets all of the Commission's requirements prior to the current July 1, 2019 implementation deadline.² Accordingly, based on the current timeline and coupled with the current state of technology and development, Frontier believes it will need to deploy the Raspberry Pi add-on in order to conduct the Commission's required speed tests by July 1, 2019.

Given this potential necessity to deploy new equipment in a customer home, Frontier requested that the Commission's random selection methodology incorporate the ability for carriers to roll out the equipment to new customers as those customers sign up for Frontier service. Frontier explained that as a practical matter, it cannot make customers attach a microcomputer to their remote gateway if they do not want to do so. Frontier further explained that in the context of the Measuring Broadband America program, participating companies sign a Code of Conduct³ and email customers to solicit volunteers to participate in the program. This approach to soliciting

¹ See *Connect America Fund*, Order, 33 FCC Rcd 6509 ¶ 40 (2018).

² See *id.* ¶ 67.

³ See, FCC, Measuring Broadband America: Fixed Broadband, Technical Appendix to the Eighth MBA Report § 5.2 (2018), available at <https://bit.ly/2GuV2d5>.

volunteers recognizes the tradeoff between a perfectly random sample and the fact that we cannot force customers to participate. While other approaches to deploying “whiteboxes” may yield a more perfectly random sample, they would come at a significant cost – and a cost here that would be a direct drain on broadband deployment.

Frontier explained that allowing the companies to ship testing devices with new services would strike the right balance between achieving a random sample and preserving scarce resources for broadband deployment. By allowing carriers to deploy the devices as they are selling products, no additional truck roll or instructions would be necessary, and discounts and incentives could be offered on new packages rather than being a drain on existing revenues. At the same time, the Commission would still ensure all program requirements are met. For instance, Frontier anticipates that it will deploy 1,800 devices across its CAF footprint as part of this program –compared to the approximately 400 devices across its entire footprint as part of the Measuring Broadband America program. To the extent the Commission would like to ensure the same sales efforts are made across all parts of the CAF deployment, it could require carriers to, for instance, randomize the sales leads before starting the outreach to ensure a good sample across the phases of the CAF deployment.

By working with carriers to streamline the broadband measurements sample, the Commission can encourage prudent use of resources to maximize funds for broadband deployment while safeguarding the integrity of the high-cost program. And if the Commission believes that even further protections for random selection are required, the Commission could help fund those additional requirements.

If you have any questions, please contact the undersigned.

Sincerely,

/s/ AJ Burton

AJ Burton

cc: Cha-Chi Fan
Alec MacDonell
Stephen Wang
Rodger Woock
Suzanne Yelen
Cathy Zima